## Summary

The Industrial Park at TransAlta, LLC (IPAT) is a non-profit organization whose mission is to establish an industrial park on a portion of the TransAlta Centralia Mine site that would create an employment center for the region. IPAT proposes amendments to the Lewis County Comprehensive Plan and County Code and designation of up to 4,400 acres of former coal mining land as an Industrial Land Bank (ILB) under provisions of the Washington State Growth Management Act (GMA; RCW 36.70A.368).

The GMA allows a county meeting certain criteria to establish a process for designating a master planned location for major industrial activity on former coal mine lands outside existing urban growth areas. The provisions adopted under RCW 36.70A.368 apply to a county that, at the time the designation process is established, had a surface coal mining operation in excess of 3,000 acres that ceased operation after July 1, 2006 and that is located within 15 miles of the Interstate 5 (I-5) corridor. Lewis County meets both these criteria.

IPAT proposes two categories of amendments. The first category involves amendments to the Lewis County Comprehensive Plan that would establish policies for allowing and reviewing ILBs under RCW 36.70A.368. The second category involves amendments to Chapter 17.20 of the Lewis County Code (LCC) that would implement the new Comprehensive Plan provisions and establish specific application and review procedures for ILBs.

Lastly, designation of the ILB is proposed. The proposed site meets all the designation requirements of RCW 36.70A.368. Specifically, the site is on lands (a) formerly used or designated for surface coal mining and supporting uses; (b) that consist of an aggregation of land of one thousand (1,000) or more acres, which is not required to be contiguous; and (c) that are suitable for manufacturing, industrial, or commercial businesses.

The primary purpose of the proposal is to implement the provisions of RCW 36.70A.368 and to provide a framework for Lewis County to evaluate future proposals for industrial development projects on the site. Designation of the ILB would address the need for large industrial development sites in the northwest and in Lewis County in particular. Designation and development of the site for industrial use would also help to reverse Lewis County's loss of economic ground over the last 30 years as compared to Washington State as a whole.

The Washington State Environmental Policy Act (SEPA, RCW 43.21C) directs local and state agency decision-makers to consider the environmental consequences of their actions. For this proposal, Lewis County is the SEPA lead agency and has the primary responsibility for complying with SEPA procedural requirements. This Draft Environmental Impact Statement (DEIS) has been prepared in accordance with the SEPA Rules, Washington Administrative Code (WAC) 197-11 and the Lewis County Code Chapter 17.110.

Because adoption of the proposed Comprehensive Plan and Code amendments would not, in itself, directly create any impact on the environment, the analyses in this document focus on potential impacts that would be associated with development of an industrial park on the site and operation of industrial facilities

that may locate there. Because the proposal does not involve specific industrial development projects at the site, this DEIS contains a broad analysis of potential environmental impacts that can be reasonably predicted at this time.

The potential environmental impacts associated with development of the site as an industrial park are summarized below, as are measures that could be employed to mitigate potential impacts. No significant environmental impacts that cannot be mitigated have been identified by this analysis. If the proposal is adopted, additional SEPA review would be conducted for specific development projects as they are defined and readied for construction and detailed information becomes available to fully evaluate their environmental impacts.

### Earth

The area potentially subject to earth impacts from development would not be expected to exceed 1,200 acres. Additional land offsite may be disturbed as part of the extension of utilities to the site. The offsite acreage affected would not be known until final decisions are made regarding provision of utilities. Reclamation of the site is currently underway and filling, grading, and other earth-moving activities on the site would continue while reclamation is completed and developable areas are prepared for future industrial use. Construction of buildings, parking areas, and other facilities associated with development of the industrial park could involve cutting and filling of some of the previously re-graded areas. It is likely that some structural fill material would need to be imported to the site, but cut and fill volumes and structural fill needs would not be known until specific development projects are designed.

Measures that may be employed to mitigate impacts to earth include:

- Preparing and following a Stormwater Pollution Prevention Plan for each project
- Employing Best Management Practices (BMPs) for erosion control and stormwater management
- Maintaining required buffer widths between construction sites and regulated wetlands and streams
- Regularly monitoring replanted sites and repairing areas of erosion
- Adhering to structural seismic design requirements current at the time of project construction
- Adhering to all applicable laws, regulations, and ordinances
- Adopting appropriate conditions, covenants, and restrictions (CC&Rs) for development

### Air

Air emissions associated with reclamation activities (primarily particulate matter from earthmoving and engine exhaust from heavy equipment) would continue intermittently until reclamation of the site is complete and developable areas prepared for future industrial use. Earthmoving associated with construction of roadways, parking areas, buildings, and other facilities at the proposed industrial park would generate particulate matter. Effects on ambient air quality would not

be expected to be significant, but care would be needed during dry or windy periods to ensure that fugitive dust was not carried off site. Heavy equipment used for construction would emit engine exhaust.

Measures that may be implemented to control construction-related air emissions include:

- Watering exposed earth surfaces, especially during windy or dry periods
- Using erosion control matting, mulching, or plastic covering to control windblown dust from exposed soils
- Maintaining a stabilized site entrance during construction
- Installing tire washes at the project site access to minimize tracking of soil onto public roadways
- Establishing vegetation on areas that are not covered by buildings or pavement as soon as practicable following construction
- Requiring contractors to use only properly maintained construction equipment fitted with approved emissions control devices
- Requiring contractors to avoid unnecessary idling of motorized equipment
- Adhering to all applicable laws, regulations, and ordinances
- Adopting appropriate CC&Rs

Industrial operations would produce air pollutants. Details on the types and quantities of air emissions would not be known until specific projects are proposed. Typical emissions from both heavy and light manufacturing operations include particulate matter, carbon monoxide (CO), nitrogen oxides ($NO_x$), sulfur dioxide ($SO_2$), volatile organic compounds, and various substances classified as hazardous air pollutants. A variety of control technologies could be required to ensure that emissions from industrial operations at the site do not cause exceedances of regulatory limits on air pollutants. The specific control technologies used would depend on the type and quantity of air emissions associated with each development project.

Diesel-powered trucks and railway locomotives used to transport goods to and from the site and employee and visitor automobile trips would release particulate matter, CO, $SO_2$, and $NO_x$. These emissions are regulated by federal emissions standards for motor vehicles and locomotives.

**Water**

Stormwater runoff from the site would continue to be collected and diverted into the existing stormwater management system while reclamation and preparation of the site for industrial use is underway. Development of the industrial park would involve construction of impervious surfaces such as roadways, parking areas, and building rooftops that would decrease infiltration and increase the rate and volume of stormwater runoff from the site. The magnitude of these increases is not known at this time and would depend on the total areal coverage of impervious surfaces when the site is fully developed. TransAlta has committed to investigating with IPAT the potential for providing ongoing stormwater management to the industrial park. If this option proves to be feasible from an

engineering and regulatory standpoint, TransAlta would maintain the existing drainage collection and treatment system around the perimeter of the industrial site, and tenants of the industrial park would develop internal collection and treatment systems that deliver flows to the TransAlta system at specific locations.

Areas on the developed site that could contribute pollutants to stormwater would include internal roadways and parking areas, which could become contaminated with oil, grease, and other petroleum products from vehicles. Impacts on the quality of ground or surface water could occur from spills of fuel or other chemical products.

It is expected that, at least initially, domestic wastewater would be discharged to individual on-site septic systems. Adverse changes in water quality could occur as a result of on-site disposal of domestic or process wastewater. Any operation that proposes to discharge wastewater from commercial or industrial processes into "waters of the state" would be required to obtain a discharge permit.

Measures that may be implemented to reduce impacts on surface water and water quality include:

- Adhering to the requirements of the Stormwater Management Manual for Western Washington
- Maintaining required buffer widths between construction sites and regulated wetlands and streams
- Regularly monitoring replanted sites and repairing areas of erosion
- Preparing and following Stormwater Pollution Prevention Plans for each development project
- Preparing and following Spill Prevention, Control, and Countermeasures plans for any construction project or operation that uses, stores, or disposes of fuel or chemical products
- Adhering to all discharge limitations specified in National Pollutant Discharge Elimination System (NPDES) permits for construction and operations
- Adhering to design, operation, maintenance and monitoring requirements for on-site septic systems
- Adhering to all applicable laws, regulations, and ordinances
- Adopting appropriate CC&Rs

Construction of impervious surfaces such as roadways, parking areas, and building rooftops would reduce infiltration of stormwater on a portion of the site and could reduce local groundwater recharge. To mitigate potential impacts on groundwater recharge, a variety of Low Impact Development (LID) practices could be used.

### Plants and Animals

Industrial development would involve removal of grasses and recently planted trees in some reclaimed areas. This would reduce the availability of habitat for animals such as black-tailed deer that use recently reclaimed sites. Animals

inhabiting these areas would be displaced and likely move into nearby pasture and forest habitats.

Over the development period, construction of buildings and other site features may alter the diurnal and/or seasonal movement of elk, deer, and other animals that move through the area. The site's extensive undeveloped acreage would provide ample area for movement of animals during construction.

The noise, light, and human presence that would result from construction and operation of industrial facilities and infrastructure would disturb animals and could reduce the value of nearby habitats for wildlife. Some species that use the site, including elk and black-tailed deer, are habituated to disturbance associated with mining and site reclamation.

There would be an increase in vehicle traffic on interior roads and along Big Hanaford Road that would likely result in increased injury to and mortality of wildlife as a result of animal-vehicle collisions. The species most affected would be black-tailed deer, although elk, squirrels, raccoons, skunks, and other animals would also be at risk.

Fish and other aquatic species could be affected by changes in water quality from the introduction of pollutants in stormwater, on-site septic system failures, or spills of fuel or chemicals. Potential water quality impacts and mitigation measures are discussed above.

It is possible that there would be some impacts on wetlands or wetland buffers from construction of a new rail spur and/or on-site septic facilities, as these facilities are typically constructed on low-lying ground. Construction that could affect wetlands would be subject to the review and permitting requirements of the relevant sections of the Clean Water Act (CWA) and the Lewis County critical areas regulations. This would include compliance with requirements for maintaining setbacks and vegetated buffer zones, implementing BMPs to reduce or eliminate water quality impacts, mitigating unavoidable effects, and other measures.

Mitigation measures that could be implemented to reduce impacts to wildlife and wildlife habitat include:

- Installing deer/elk crossing signs or other warning signs along roadways in locations where animals are known to travel
- Minimizing the use of fencing and other structures that create barriers to animal movements
- Establishing and maintaining vegetated buffers between development sites and high value habitat areas
- Installing signs to educate workers and visitors about the importance of wildlife habitats on the site and ways to minimize wildlife disturbance
- Adopting a formal fish and wildlife management plan for the industrial park, with the goal of increasing habitat values across the site
- Adhering to all applicable laws, regulations, and ordinances
- Adopting appropriate CC&Rs

**Environmental Health**

Noise associated with reclamation would continue until reclamation of the site is completed and developable areas are prepared for future industrial use. During construction of industrial facilities, there would be temporary increases in noise from operation of heavy equipment and power tools. These increases in noise would occur intermittently over the 20-year development period and would likely be less than noise that was produced from the site during active mining.

Mitigation measures employed to reduce the impacts of construction noise may at times include:

- Requiring construction contractors to maintain all motorized equipment with properly sized mufflers, engine intake silencers, and engine enclosures
- Prohibiting the idling of motorized equipment for long periods
- Requiring stationary construction equipment such as generators and compressors to be located away from sensitive receiving properties, or requiring portable noise barriers to be placed around the equipment
- Limiting or prohibiting outdoor construction during nighttime hours
- Adhering to all applicable laws, regulations, and ordinance
- Adopting appropriate CC&Rs

Because the current proposal does not include specific development projects, the types and levels of operational noise that could be produced at the site are not known at this time. In general, the major categories of noise sources associated with industrial facilities are: (1) fixed equipment or process operations; (2) mobile equipment or process operations; and (3) transport of raw materials, products, or waste, and transport of workers and visitors to and from the site.

Measures that may be implemented to reduce operations noise impacts include:

- Establishing setbacks from sensitive noise receptors
- Establishing and maintaining vegetative buffers
- Erecting portable noise barriers
- Requiring that noise-producing activities be conducted indoors or in enclosed areas
- Staggering work shifts to reduce traffic noise
- Adhering to all applicable laws, regulations, and ordinances
- Adopting appropriate CC&Rs

While reclamation is being completed and the site prepared for industrial use, there would be the potential for fire, explosion, or spills of diesel fuel or other petroleum products associated with the use of heavy construction equipment. Construction and operation of industrial facilities would entail the potential for accidental fire, explosion, or spills that could result in releases of toxic or hazardous materials. If such an event were to occur, effects would most likely be

contained within the immediate area; however, depending on the magnitude of the event, impacts could extend offsite.

Although the potential is low, there is the possibility that sparks could ignite fires along the rail spur during dry summer weather. In the event of a collision or other accident, toxic materials could be released from rail cars using the rail spur.

Fires in coal seams and waste deposits can result from spontaneous combustion or by accidental ignition from forest fires or other means. Smoldering coal seams can result in subsidence of surface infrastructure, reignite grass, brush, or forest fires, and present a respiratory health hazard for those nearby. TransAlta's reclamation plan includes provisions for covering all exposed coal seams with a minimum of four feet of earthen material to reduce the potential for oxidation reactions that could result in coal combustion.

Other measures that may be implemented to reduce the potential for fire, explosion, and other environmental health impacts include:

- Preparing and following Spill Prevention, Control, and Countermeasures plans for any construction project or operation that uses, stores, or disposes of fuel or chemical products
- Following all applicable guidelines established under the Hazardous Materials Transportation Act (HMTA) for railroads and other carriers of hazardous materials
- Following all applicable local, state, and federal regulations pertaining to shipment, handling, storage, use, and disposal of hazardous materials
- Adhering to all other applicable laws, regulations, and ordinances
- Adopting appropriate CC&Rs

**Land Use**

The proposal would create a new Urban Growth Area. The Comprehensive Plan designation of the site would be changed from Mineral Resource Land, Forest Resource Land and a small amount of Rural Residential to an ILB and the site would be rezoned to industrial. An estimated 914 to 1,000 acres of the new ILB would be developed for industrial purposes over a period of about 20 years. Another 200 acres would be developed as infrastructure corridors. The remainder of the site would be largely open space and buffer areas. All or a portion of the site's upland forests could be managed for commercial timber production.

The proposal is consistent with applicable laws, policies, plans, and regulations, including the GMA, the Lewis County Countywide Planning Policies, the Lewis County Comprehensive Plan, and County development regulations applicable to major industrial development.

To a large extent residences in the area would be buffered from activities at the site by distance and the nearest local topography, although views of the site would be altered from some vantage points on nearby roadways. The visual elements on the site could range from those typically associated with heavy industry such as silos, exhaust stacks, exposed piping, and materials stockpiles to fully-enclosed buildings in which light manufacturing activities occur. Effects on

visual aesthetics would be softened by the large portion of the site that would remain undeveloped and be maintained as a visual buffer. Nighttime lighting required for safety and security would likely be visible from some locations.

Mitigation measures that may be implemented to reduce impacts on visual aesthetics include:

- Requiring outdoor lights to be shielded or recessed and directed downward or toward the interior of the site
- Establishing design standards for landscaping and signage to achieve a consistent appearance among developments
- Requiring the exterior of buildings and other structures to be finished in non-reflective, natural-toned materials
- Requiring storage and service areas to be shielded from view by walls, fencing, or vegetation
- Maintaining a vegetative buffer along the perimeter of the site
- Adopting appropriate CC&Rs

The potential for the presence of or impacts on previously-unidentified historical or archaeological artifacts or sites is considered remote owing to the position of the proposed ILB site in the landscape and the ground disturbance associated with past mining, logging, and agricultural activities. Therefore, a standard mitigation approach would likely be sufficient to avoid impacts on historical, archaeological, or cultural resources. In the event that artifacts or other indications of a historical or archaeological nature were to be discovered on the site at any time, activity in the area of the find would immediately cease until it could be evaluated by a qualified archaeologist in consultation with the Department of Archaeology and Historic Preservation and the Chehalis Tribe, depending on the artifacts or indications found. Additional mitigation measures, if needed, would be based on the nature and significance of the find.

**Transportation**

The key roadways in the area that serve the site and could be affected by development of the industrial park are Big Hanaford Road, SR 507, Reynolds Avenue, and Harrison Avenue. Traffic increases would be a function of employee density and the specific industrial and manufacturing uses at the site. Based on the types of businesses targeted by IPAT, an estimated employee density of 2.2 employees per acre was used to analyze traffic impacts. At full build-out of the industrial park, there would be an estimated 6,717 daily trips to and from the site. Approximately 537 of those trips would be truck traffic; the remainder would be passenger vehicles. During the PM peak commute hour (from 4:00 to 5:00 PM), analysis indicates that there would be 185 vehicles entering the site and 740 leaving the site. Trip generation would be higher if a higher employee density is achieved. Nearly all trips to the site would use SR 507 and Big Hanaford Road, with most trips converging at the Reynolds Avenue/SR 507 intersection.

Analysis indicates that by 2030, several local roadway segments would be over capacity and may experience congestion; in some cases, this is predicted to occur whether the industrial park is developed or not.

For future development proposals at the industrial park site, Lewis County would determine the specific environmental analysis requirements for each proposal. Detailed Traffic Impact Analysis reports may be required of future proposals and mitigation measures may be required as part of specific development permits to address traffic impacts.

There are a number of measures that could be employed to reduce the number of vehicle trips to and from the industrial park. These include:

- Requiring employers to implement strategies to encourage their employees to carpool This could include assistance in matching interested employees within their organization or with nearby industrial uses, arranging rideshare formation meetings, offering financial subsidies for not commuting to work alone, or offering a guaranteed ride home for carpoolers.
- Requiring employers to encourage employees to vanpool
- Moving trips outside of peak commute times by shifting work start times
- Operating a van or bus to shuttle employees from park-n-ride lots in Centralia and Chehalis
- Adopting appropriate CC&Rs

**Public Services**

During construction at the industrial park, there would be the potential for an increase in the number of calls to the Sheriff's Office related to trespassing, theft of construction materials, and vandalism. As tenants locate at the industrial park, there would be the potential for increased demand for police services related to trespassing, theft, and vandalism and the increase in traffic on local roads would likely lead to additional needs for traffic patrols and calls related to motor vehicle accidents.

To mitigate the increased needs for police protection, individual tenants could require their contractors to implement a fill-time security plan during construction and operation. In addition, IPAT could include a comprehensive safety and security component in its site management plan.

During construction, there could be an increase in the need for fire protection and/or emergency response related to equipment fires, on-the-job injuries, or spills of fuel or chemicals used in construction.

Plans for development projects would require review for compliance with local and state fire safety regulations, and there would be additional demand for plan reviews and building inspections.

Any industrial operation involves the potential for fire, spills, or accidents. Industrial operations also often involve transportation, storage, use, and disposal of hazardous materials. The local fire district may need additional capacity to respond to industrial emergencies involving hazardous materials. The presence

of multi-story buildings at the industrial park could require additional equipment and potentially additional firefighter training to respond to incidents involving such structures.

Measures that may be implemented to mitigate fire risks include:

- Complying with Department of Natural Resources (DNR) equipment rules and regulations for work in forested lands.
- Contracting with the local fire authority for additional or specialized protection services during construction
- Providing training to fire authority personnel on how to respond to fires related to their specific industry
- Coordinating with the DNR and local fire district when fire danger is high
- Adhering to all applicable laws, regulations, and ordinances
- Adopting appropriate CC&Rs

Construction and operation of industrial facilities at the site would generate solid waste that would be collected and transported off-site by a franchised local solid waste hauler for ultimate disposal at the Roosevelt Regional Landfill in Klickitat County. Industrial processes could also produce dangerous or hazardous wastes. Handling, storage, transportation, and disposal of such wastes would be subject to Washington State's Dangerous Waste Regulations and applicable provisions of the federal Resource Recovery and Conservation Act.

Puget Sound Energy has indicated willingness to supply natural gas service to tenants of the industrial park, and has enough capacity on its pipeline system to provide this service. Providing natural gas to the proposed industrial park would require extension of Puget Sound Energy's intermediate pressure system from a point approximately four miles from the site.

The proposed industrial park is located within the service area of the Lewis County Public Utility District #1. Electrical service for the industrial park could be provided by a new connection to the existing power line that runs through the site. This would likely require one or more new electrical substations.

It is expected that, at least initially, domestic wastewater would be discharged to individual on-site septic systems. Other options include expansion of TransAlta's existing domestic wastewater treatment system to accommodate domestic wastewater flows from the industrial park, constructing an on-site treatment plant, or connecting to the City of Centralia's wastewater collection and treatment system. The proposed ILB site is not within the City of Centralia's current service area for sewer, so connecting to the municipal sewer system would require amendment of the City's comprehensive sewer/wastewater plan and construction of a new main from the site to the City's system.

Tenants at the site would also produce industrial process wastewater Wastewater volumes vary widely among industries; however, it is estimated that at full build-out the industrial park could produce between 1.2 million to 2.5 million gallons per day (GPD) of process wastewater. Based on the target industries identified by IPAT, 1.5 million gpd of process wastewater is considered a

reasonable planning-level estimate for the site.Depending on the type and quality of wastewater produced and the pre-treatment applied to it, process wastewater could be reused, discharged through on-site drainfields or underground injection, or conveyed to the City of Centralia's wastewater treatment plant. As with domestic wastewater, the latter option would require amendment of the City's comprehensive sewer/wastewater plan and construction of a new main from the site to the City's system.

It is estimated that domestic water needs could range from approximately 30,000 gpd to 120,000 gpd; based on the expected employment density, domestic water needs would likely be on the scale of 30,000 to 33,000 gpd. Process water needs are estimated at 1.2 million gpd to 2.5 million gpd depending on the needs of specific tenants. Based on the identified target industries, process water needs would likely be approximately 1.5 million gpd. The volume of water needed for industrial processes could be reduced by various water conservation measures including re-use of treated wastewater. A planning-level estimate of fire flow needs indicates that a total of one million gallons of water would need to be stored on site to ensure adequate fire flows. Potential water sources include new on-site groundwater wells, transferring some of TransAlta's existing water rights for use by the industrial park, and connecting to the City of Centralia's municipal water system. Because the proposed ILB site is not within the City of Centralia's current service area for water supply, connecting to the municipal water system would require amendment of the City's comprehensive water plan and construction of a new water main.